

Message

From: Chad Powell [cpowell@ltenv.com]
Sent: 7/15/2019 9:58:12 PM
To: Beeler, Cindy [Beeler.Cindy@epa.gov]
CC: North, Alexis [North.Alexis@epa.gov]
Subject: RE: Subpart OOOOa questions

Hi Cindy,

I hope you had a great weekend and have made progress on your deadlines. I have an additional question for you regarding Subpart OOOOa. I'm going to add it to the list and when possible, can you answer all 3 questions? The additional question is:

- Onshore natural gas processing plants subject to Subpart OOOOa require Method 21 monitoring (cross-referenced with Subpart VVa). Are operators allowed to use Method 21 annually (i.e. once per year) and use OGI cameras to conduct their inspections the other 11 months as an alternative means of compliance with the regulation? Based on Section 60.18(g), I don't think this is allowed. But my interpretation may be off.

Thanks,

Chad Powell
Senior Air Quality Scientist
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From: Beeler, Cindy <Beeler.Cindy@epa.gov>
Sent: Tuesday, July 09, 2019 1:43 PM
To: Chad Powell <cpowell@ltenv.com>
Cc: North, Alexis <North.Alexis@epa.gov>
Subject: RE: Subpart OOOOa questions

Chad – I am in the middle of some pressing work with deadlines – I will look into your questions soon and get back to you.

Cindy Beeler
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From: Chad Powell <cpowell@ltenv.com>
Sent: Tuesday, July 9, 2019 1:19 PM
To: Beeler, Cindy <Beeler.Cindy@epa.gov>
Cc: North, Alexis <North.Alexis@epa.gov>
Subject: Subpart OOOOa questions

Hi Cindy,

Alexis asked that I reach out to you regarding a couple Subpart OOOOa questions. Here we go:

- I couldn't find a due date for Subpart OOOOa semi-annual reports for onshore natural gas processing plants. While the regulation stipulates semi-annual reporting, I don't see whether the report is due within 30 days of the end of the period or some other timeframe. Can you please clarify this?
- Under the upstream production segment, a 2-hour Method 22 test is required when initially evaluating the flare/combustor. Subsequent testing should be performed monthly but for 15 minutes (instead of 2-hours). However, Section 60.5412a(a)(3) requires that a flare be designed and operated to comply with Section 60.18(b). Section 60.18(f)(1) requires 2-hour Method 22s each time. Does this conflict? Does one part of the regulation take precedent over the other? Please clarify.

If you have any questions for me, please let me know.

Thanks,



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